THE HONORABLE ROBERT S. LASNIK 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 SANDRA K. LONG, a single individual, No. 2:19-cy-00568 RSL 10 Plaintiff, STIPULATED JOINT MOTION AND 11 ORDER FOR CONTINUANCE OF v. SETTLEMENT CONFERENCE 12 USAA CASUALTY INSURANCE **DEADLINE** COMPANY, DOES I-X, 13 Defendants. 14 15 I. STIPULATION AND MOTION 16 COME NOW Plaintiff Sandra K. Long and Defendant USAA Casualty Insurance 17 Company ("USAA"), by and through their counsel of record, and hereby make this stipulated joint 18 motion that the Settlement Conference deadline be continued from April 20, 2020 to July 20, 19 2020. No other deadlines shall be impacted by this continuation of the Settlement Conference 20 deadline. 21 The Court may modify deadlines in its scheduling order "for good cause." LCR 16(b)(6). 22 Good cause exists here. Washington remains under a Stay Home, Stay Safe order until at least 23 May 4, 2020. On March 17, 2020, the Court issued General Order No. 02-20, closing the Seattle 24 courthouse for at least 30 days. On April 13, 2020, the Court issued General Order No. 07-20, 25 extending the closure of the Seattle courthouse for at least thirty days. All civil in-person hearings

STIPULATED JOINT MOTION AND ORDER FOR CONTINUANCE OF SETTLEMENT CONFERENCE DEADLINE – 1

CORR CRONIN LLP 1001 Fourth Avenue, Suite 3900 Seattle, Washington 98154-1051 Tel (206) 625-8600 Fax (206) 625-0900 and trial dates in the Court scheduled to occur before July 1, 2020, are continued pending further order of the Court. The Stay Home, Stay Healthy order and the Court's closure make it impractical for the parties to conduct a meaningful settlement conference until the current public health measures and restrictions have been lifted. Additionally, the current COVID-19 pandemic has prevented the parties from conducting depositions previously scheduled in March and April 2020. This discovery is pertinent to the parties' ability to engage in substantive settlement negotiations. The Court's General Order No. 02-20 expressly contemplates that "[s]cheduling orders in cases may need to be amended as appropriate on a case-by-case basis." For the foregoing reasons, the parties agree to and request a continuance of the Settlement Conference deadline from April 20, 2020 to July 20, 2020. This continuance will not affect any other deadlines and will allow the parties to conduct a meaningful settlement conference with the benefit of additional discovery ahead of the August 3, 2020 trial date. DATED this 20th day of April, 2020. CORR CRONIN LLP ROBERT D. BOHM, P.L.L.C. s/Blake Marks-Dias Blake Marks-Dias, WSBA No. 28169 Victoria E. Ainsworth, WSBA No. 49677 PO Box 25536

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STIPULATED JOINT MOTION AND ORDER FOR CONTINUANCE OF SETTLEMENT CONFERENCE DEADLINE -2

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II. ORDER 1 IT IS SO ORDERED that, for good cause shown, the parties may extend the Settlement 2 Conference deadline to July 20, 2020. All other court deadlines provided in the December 5, 2019 3 Amended Order Setting Trial Date and Related Dates shall remain in effect and unchanged. 4 5 April 21, 2020 6 DATED: MMS Casnik 7 8 HONORABLE ROBERT S. LASNIK 9 United States District Court Judge 10 Presented by: 11 CORR CRONIN LLP ROBERT D. BOHM, P.L.L.C. 12 s/Blake Marks-Dias s/Robert D. Bohm (per email authorization) 13 Blake Marks-Dias, WSBA No. 28169 Robert D. Bohm, WSBA No. 42703 Victoria E. Ainsworth, WSBA No. 49677 PO Box 25536 14 Federal Way, WA 98093 1001 Fourth Avenue, Suite 3900 15 Seattle, WA 98154 (206) 463-6767 Phone Email: rdbohm@premisesinjurylaw.com (206) 625-8600 Phone 16 E-mail: bmarksdias@correronin.com tainsworth@correronin.com 17 Attorneys for Defendant USAA Casualty Attorneys for Plaintiff Insurance Companyf 18 POLI, MOON & ZANE, PLLC 19 s/ Michael Poli (per email authorization) Michael Poli, WSBA No. 54631 20 2999 N. 44th Street, Suite 325 21 Phoenix, Arizona 85018 602-857-8180 Phone 22 Email: mpoli@pmzlaw.com Attorneys for Plaintiff (admitted pro hac 23 vice) 24 25